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15 *Attorneys for Plaintiff*
16 *Ruben Flores*

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 RUBEN FLORES,
21
22 Plaintiff,
23
24 vs.
25
26 ASSUREHIRE, INC.,
27
28 Defendant.

Case No.: 2:25-cv-01621-WLH-SK

**DECLARATION OF MEIR
RUBINOV IN OPPOSITION OF
DEFENDANT ASSUREHIRE,
INC.'S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P.
12(b)(6)**

Hearing Date: June 6, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B

Complaint filed: February 26, 2025
Trial Date: Not set

1 Meir Rubinov, an attorney duly admitted *pro hac vice* to practice in this
2 District, hereby declares as follows:

3
4 1. I am associated with the law firm of Consumer Attorneys, PLLC,
5 counsel for Plaintiff in this action. I am actively involved in the prosecution of this
6 action, and familiar with its proceedings.

7
8 2. I offer this declaration in opposition to Defendant AssureHire Inc.'s
9 motion to dismiss for the limited purpose of introducing documents that are cited in
10 the accompanying memorandum of law in opposition to the motion to dismiss.

11
12 3. Exhibit 1 is the clean version of Plaintiff's Proposed Amended
13 Complaint for Violations of the Fair Credit Reporting Act (the "PAC").

14
15 4. Exhibit 2 is a redline comparing the operative complaint in this matter
16 (ECF No. 1) with the PAC.

17 I declare under penalty of perjury that the foregoing is true and correct.
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19
20 */s/ Meir Rubinov*

21 _____
Meir Rubinov
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